

Exhibit 3

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD.;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR,)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON)	
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS, LLC,)	
)	
Defendants.)	

**NETLIST, INC.’S INITIAL DISCLOSURES
AND ADDITIONAL DISCLOSURES**

Plaintiff Netlist, Inc. (“Netlist”) hereby submits its Initial and Additional Disclosures pursuant to Federal Rule of Civil Procedure (“Rule”) 26(a)(1) and the Court’s Order. Netlist’s disclosures represent a good faith effort to identify information it reasonably believes is discoverable and that it may use to support its claims or defenses as required by Rule 26(a)(1). These disclosures, while based on diligent exploration by Netlist and its counsel, reflect only the current state of Netlist’s knowledge, understanding, and belief on these subjects. Netlist continues to investigate the facts relating to this action. Accordingly, these disclosures are neither intended

any and all grounds, including, without limitation, the attorney-client privilege, the work product doctrine, or any applicable privilege. No current or former employee of Netlist should be contacted without the prior permission of Netlist's counsel.

Name	Contact	Summary of Information
Chun K. Hong	Irell & Manella LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, CA 90067 (310) 277-1010	Netlist's President and CEO and may have knowledge related to the Patents-in-Suit, Netlist's operations, research and development and interactions with Samsung.
Gail Sasaki	Irell & Manella LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, CA 90067 (310) 277-1010	Netlist's CFO and may have knowledge of Netlist's financials including the sales, cost, and profits of Netlist's products, and investment in research and development.
Jeffrey C. Solomon	Irell & Manella LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, CA 90067 (310) 277-1010	Named inventor of the '912, '417, and '215 patents.
Scott H. Milton	Irell & Manella LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, CA 90067 (310) 277-1010	Netlist's VP of Engineering and may have knowledge related to the conception, reduction to practice, and research and development related to the patents, and Netlist's R&D and engineering in general.
Mario Martinez	Irell & Manella LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, CA 90067 (310) 277-1010	Information relating to Netlist's participation at JEDEC.
Jung-Bae Lee	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Business transactions and interactions between Samsung and Netlist; Samsung's memory business operation, technology sales/marketing, and R&D.
Jin Man Han	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Business transactions and interactions between Samsung and Netlist; Samsung's memory business marketing and sales.

Joo Young Lee	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Samsung's DRAM products and technology.
You Keun Han	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Samsung's DRAM products and technology.
Seung-Mo Jung	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Samsung's DRAM products and technology.
Tae Yang Yoon	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Samsung memory manufacturing.
Hyung Jong Ko	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Samsung memory design and development.
Jin Hyeok Choi	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Samsung Solution Product and Development.
Dongjun Choi	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Sales and marketing of Samsung's DRAM products.
Sung Joo Park	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Samsung's JEDEC involvement related to DDR4.
Eung Soon Park	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Samsung Strategic Planning.
Yong Cheol Bae	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Samsung application engineering.
Kyu Young Lee	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	Samsung brand product business.

Yong Hwangbo	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	The Joint Development and License Agreement between Netlist and Samsung.
Kyuhan Han	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	The Joint Development and License Agreement between Netlist and Samsung.
Byungyup Jeon	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	The Joint Development and License Agreement between Netlist and Samsung.
Hyeoksang Yoo	Samsung Electronics Co., Ltd. 129 Samsung-ro, Yeongtong-gu Suwon-si, Gyeonggi-do Republic of Korea	The Joint Development and License Agreement between Netlist and Samsung.
Samsung engineers		Design, development, manufacture, use, marketing, and sales of Samsung's DDR4 DIMM, DDR5 DIMM, and HBM products.
Samsung suppliers of MICs, data buffers, RCDs, and other relevant parts		Component design, structure, and operation.
JEDEC personnel and attendees		JEDEC policy, course of dealing and industrial practice.
Samsung direct and indirect customers		Information on the value of the accused products, locations of sales and offers for sale, and Samsung's role in designing and supplying components for devices.

In addition to the individuals listed above, other individuals likely to have discoverable information include:

1. Any person identified by Samsung in its initial and additional disclosures.
2. Relevant third parties, including Samsung's customers, distributors, suppliers, or other business partners.
3. Custodians of pertinent records (who will likely have knowledge relevant to the authenticity or admissibility of documents, information, things, and/or testimony).

Patent Act for Samsung's infringement of the Patents-in-Suit, including monetary damages pursuant to 35 U.S.C. § 284. Netlist also intends to seek pre-judgment and post-judgment interests, enhanced damages for willful infringement, any supplemental damages as appropriate, its attorneys' fees and costs, and other such relief deemed appropriate. Netlist is still investigating whether other damages claims would be appropriate, and will seek any other relief available under applicable law. To the extent applicable, the amount of damages sought by Netlist will be consistent with its RAND obligations for claims actually essential for practicing the JEDEC standards.

Dated: December 8, 2022

Respectfully submitted,

/s/ Jason Sheasby

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